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August 26, 2002

Ms Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

<u>Re: WC Docket No. 01-321 and 01-338</u>

Dear Ms Dortch:

On August 23, 2002, Pete Martin, Bob Blau and the undersigned representing
BellSouth, and Don Shepheard and Kelsi Reeves, both representing Time
Warner Telecom, met with Michelle Carey, Rob Tanner, John Stanley, Uzoma
Onyeije, Renee Crittendon and Christine Newcomb from the Wireline
Competition Bureau. During this meeting the attached material was discussed.
The attached material describes the proposal recommended by Time Warner
Telecom and BellSouth for encouraging a competitive marketplace. The
proposal addresses a number of issues currently pending before the Commission
in the above referenced proceedings. The proposal recommends that the
Commission grant targeted UNE relief and require carriers to start reporting
eleven special access performance measures.

In accordance with the Commission's rules, a copy of this notice is being filed
electronically in the above referenced dockets.

Sincerely,

William W. Jordan

Attachments

cc: Michelle Carey
Rob Tanner
John Stanley
Uzoma Onyeije
Renee Crittendon
Christine Newcomb

THE PROPOSAL - Recommended Policies to Encourage a Competitive Marketplace

TIME WARNER ◉ TELECOM
Delivering Networks. Empowering Business

THE PROPOSAL FULFILLS THE LETTER AND SPIRIT OF THE '96 ACT

- Reflects the underlying goals of the '96 Act, particularly local competition

- Meets the "necessary and impair" standard

- Draws on the commission's legitimate authority to promulgate performance measure and standards for special access

- Preserves the statusquo legal ante on local service tests for conversion of special access circuits

THE PROPOSAL WILL BENEFIT TELECOMMUNICATIONS END USERS

- End users will benefit from the continued availability of an enhanced, premium-quality special access offering.

- Carriers will have an incentive to invest in facilities, with the result being sustainable facilities-based competition.

- Facilities-based competition will spur innovation and new product offerings.

- Consumers will benefit from the availability of sustainable and differentiated competitive alternatives.

OUR PROPOSAL

Targeted UNE relief

- Sunset switching UNE for business customers
- Remove dedicated transport UNE where 3 or more competitive transport providers exist in either A or Z wire center
- Retain local service test for special access circuits that CLECs wish to convert or to purchase as UNEs

Special access performance measures and standards

- Adopt 11 performance metrics, similar to Joint Competitive Industry Group proposal
- Adopt performance standards
- Allow customer-specific agreements that could be adopted by other parties "as a whole," but not subject to "pick and choose"

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Details and Underlying Rationale for the Proposal

Targeted UNE Relief

•<u>Relief:</u> Switching for business customers

•<u>Rationale:</u> At a minimum, CLECs are not impaired in the provision of switching to business customers due to the availability of competitive alternatives.

•<u>Relief:</u> Transport (including entrance facilities) where either the A or Z end office has 3 or more facilities based competitors

•<u>Rationale:</u> At a minimum, CLECs are not impaired wherever there are 3 or more competitive providers of transport in the vicinity.

•<u>Relief:</u> Use restrictions should be maintained.

•<u>Rationale:</u> The DC Circuit Court decision pointed to the need to consider service markets on a discrete basis, and it is clear that IXCs are not impaired in the provision of interexchange service.

•**Key point: Maintaining UNE obligations where competitors are not impaired is bad policy and undermines the incentive to invest by both ILECs and facility-based CLECs.**

Details and Supporting Rationale for the Proposal

Special access performance measures and standards

•Special access performance measures and standards should be granted as part of the package (which includes UNE relief) to allow carriers to ensure the continued receipt of high quality services.

•The 11 measures in the proposal, which are based on the measures in the JCIG proposal, are of considerable importance to CLECs.

Areas Not Covered by this Proposal

•UNE Relief for switching provided to residential customers

•Co-mingling

•UNE Relief for High Capacity Loop Services (Loops to end-users)

•Remedies for Special Access

•Application of Performance Standards to CLECS

BST and TWTC agree to disagree on these issues and will advocate different positions.

THE PROPOSAL AS A PACKAGE IS A WINNING POLICY CHOICE

The proposal

- Targeted UNE relief
  - Sunset switching UNE for business customers
  - Remove dedicated transport UNE where 3 or more competitive transport providers exist in either A or Z wire center
  - Retain local service test for special access circuits that CLECs wish to convert or to purchase as UNEs

- Special access performance measures and standards
  - Adopt 11 performance metrics, similar to the Joint Competitive Industry Group proposal
  - Adopt performance standards

- Allow customer-specific agreements for special access that could be adopted by other parties "as a whole," but not subject to "pick and choose"
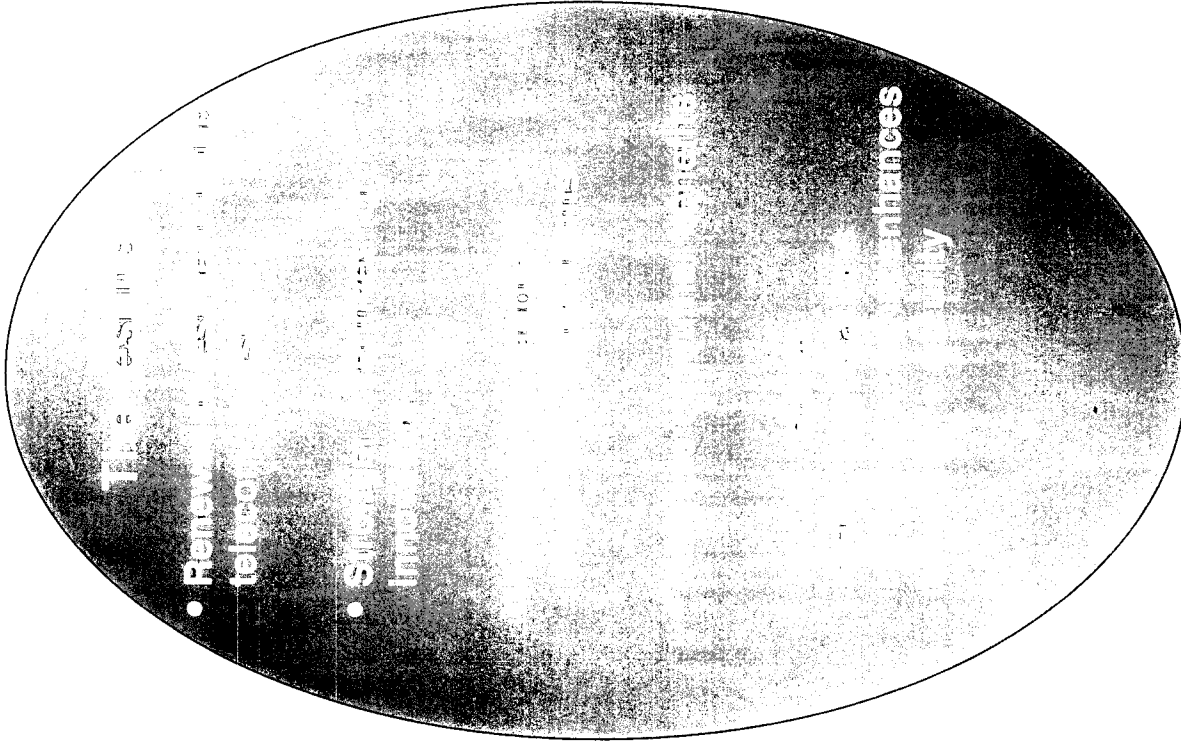
Time Warner Telecom/BellSouth Proposal

BELLSOUTH PERFORMANCE

MEASUREMENTS & STANDARDS

in the

Ordering, Provisioning,

and

Maintenance & Repair

of

SPECIAL ACCESS SERVICE

Version 1.2

Issued: August 15, 2002

TABLE OF CONTENTS

BellSouth Performance Measurements and Standards

CLEC or IXC specific total, with the following reporting dimensions for all measurements.

- Special Access disaggregated by bandwidth
  Sub Totaled by State
  Totaled by BellSouth

Special Access is any exchange access service that provides a transmission path between two or more points, either directly, or through a central office, where bridging or multiplexing functions are performed, not utilizing BellSouth end office switches.

Special access services include dedicated and shared facilities configured to support analog/voice grade service, metallic and/or telegraph service, audio, video, digital data service (DDS), digital transport and high capacity service (DS1, DS3 and OCn), collocation transport, links for SS7 signaling and database queries, SONET access including OC-192 based dedicated SONET ring access, and broadband services.

> **Exclusions:** Transmission path requests pursuant to an Interconnection Agreement for Unbundled Network Elements are excluded from these Performance Measures.

Reporting Period: The reporting period is the calendar month, unless otherwise noted, with all averages or percentages displayed to one decimal point.

BellSouth Performance Measurements and Standards
ORDERING

Description
The Firm Order Confirmation (FOC) is the BellSouth response to a clean Access Service Request (ASR), whether an initial or supplement ASR, that provides TWTC with the specific Due Date on which the requested circuit or circuits will be installed. The expectation is that BellSouth will conduct a minimum of an electronic facilities check to ensure due dates delivered in FOCs can be relied upon. The performance standard for FOCs received within the standard interval is expressed as a percentage of the total FOCs received during the reporting period. A diagnostic distribution is required along with a count of ASRs withdrawn at BellSouth's request due to a lack of BellSouth facilities or otherwise.

Calculation Methodology

Percent Meeting Performance Standard:
> [Count FOCs received where (FOC Confirm Date – ASR Receive Date) < = Performance Standard] / Total FOCs received during reporting period x 100

FOC Receipt - Distribution:
> (FOC Confirm Date – ASR Receive Date), for each FOC received during reporting period, distributed by:
> 0 day, 1 day, 2 days, through 10 days and > 10 days

ASRs Withdrawn at BellSouth Request due to a lack of BellSouth Facilities or Otherwise
> Count of ASRs, which have not yet received a FOC, Withdrawn at BellSouth Request, during the current reporting period, due to a lack of BellSouth facilities or otherwise

Business Rules
1. Counts are based on each instance of a FOC received from BellSouth. If one or more Supplement ASRs are issued to correct or change a request, each corresponding FOC, which is received during the reporting period, is counted and measured.
2. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.
3. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided within expected intervals.

Exclusions
- Unsolicited FOCs
- Disconnect ASRs
- Cancelled ASRs
- Record ASRs

Levels of Disaggregation
- DS0
- DS1
- DS3 & Above

Performance Standard
Percent FOCs Received within Standard   - DS0   = > 85% within 2 business days for year 1, 90% within 2 business days for year 2, & 95% within 2 business days for year 3
                                            - DS1   = > 85% within 2 business days for year 1, 90% within 2 business days for year 2, & 95% within 2 business days for year 3.
                                            - DS3 & Above = > 85% within 5 business days yr. 1, 90% within 5 business days yr. 2, & 95% within 5 business days yr. 3

FOC Receipt Distribution - Diagnostic

ASRs Withdrawn at BellSouth Request Due to a Lack of BellSouth Facilities or Otherwise - Diagnostic

ORDERING

Measurement: SA-2 FOC Receipt Past Due

Description
The FOC Receipt Past Due measure tracks all ASR requests that have not received an FOC from BellSouth within the expected FOC receipt interval, as of the last day of the reporting period and do not have an open, or outstanding, Query/Reject. This measure gauges the magnitude of late FOCs and is essential to ensure that FOCs are being received in a timely manner from BellSouth. A distribution of these late FOCs, along with a report of those late FOCs that do have an open Query/Reject, is required for diagnostic purposes.

Calculation Methodology
Percent FOC Receipt Past Due - Without Open Query/Reject:
> Sum of ASRs without a FOC Received, and a Query/Reject is not open, where (End of Reporting Period – ASR Receive Date >Expected FOC Confirm Interval) / Total number of ASRs received during reporting period x 100

FOC Receipt Past Due - Without Open Query/Reject - Distribution:
> [(End of Reporting Period – ASR Receive date) – (Expected FOC Confirm Interval)] for ASRs without a FOC received and a Query/Reject is not open with TWTC, distributed by;
> 1-5 Days, 6-10 Days, 11-20 Days, 21- 30 Days, 31-40 Days, and > 40 Days

Percent FOC Receipt Past Due - With Open Query/Reject:
> Sum of ASRs without a FOC Received, and a Query/Reject is open, where (End of Reporting Period – ASR Receive Date > Expected FOC Confirm Interval) / Total number of ASRs received during reporting period x 100

Business Rules
1. All counts are based on the latest ASR request sent to the BellSouth. Where one or more subsequent ASRs have been sent, only the latest ASR would be recorded as Past Due if no FOC had yet been returned.
2. The Expected FOC Receipt Interval, used in the calculations, will be the interval identified in the Performance Standards for the FOC Receipt measure.
3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.
4. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided within expected intervals.

Exclusions
- Unsolicited FOCs
- Disconnect ASRs
- Cancelled ASRs
- Record ASRs

Levels of Disaggregation
- DS0
- DS1
- DS3 & Above
-

Performance Standard
Percent FOC Receipt Past Due - Without Open Query/Reject   < 15 % FOC Receipt Past Due for year 1, 10% for year 2, & 5% for year 3.

FOC Receipt Past Due – Without Open Query/Reject - Distribution   - Diagnostic

Percent FOC Receipt Past Due - With Open Query/Reject   - Diagnostic

BellSouth Performance Measurements and Standards

ORDERING

Measurement: SA-3 Offered Versus Requested Due Date

Description
The Offered Versus Requested Due Date measure reflects the degree to which BellSouth is committing to install service on TWTC Requested Due Date (CRDD), when a Due Date Request is equal to or greater than BellSouth stated interval. A distribution of the delta, the difference between the CRDD and the Offered Date, for these FOCs is required for diagnostic purposes.

Calculation Methodology

Percent Offered with CLEC or IXC Carrier Requested Due Date:
    [Count of ASRs where (FOC Due Date = CRDD] / [Total number of ASRs where (CRDD – ASR Receive Date) = > BellSouth Stated Interval] x 100

Offered versus Requested Interval Delta – Distribution:
    [(Offered Due Date – CRDD) where (CRDD – ASR Receive Date) = > BellSouth Stated Interval] for each FOC received during the reporting period, distributed by; 0 Days, 1-5 Days, 6-10 Days, 11-20 Days, 21- 30 Days, 31-40 Days, and > 40 Days

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Business Rules
1. Counts are based on each instance of a FOC received from BellSouth. If one or more Supplement ASRs are issued to correct or change a request, each corresponding FOC, which is received during the reporting period, is counted and measured.
2. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.
3. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided within expected intervals.

Exclusions
- Unsolicited FOCs
- Disconnect ASRs
- Cancelled ASRs
- Record ASRs

Levels of Disaggregation
- DS0
- DS1
- DS3 & Above
-

Performance Standard
Percent Offered with CRDD (where CRDD = > BellSouth Stated Interval)   = 90% for year 1, & 95% for year 2.

Offered versus Requested Interval Delta – Distribution - Diagnostic

BellSouth Stated Intervals: To be determined by BellSouth

PROVISIONING

Measurement: SA-4 On Time Performance To FOC Due Date

Description
On Time Performance To FOC Due Date measures the percentage of circuits that are completed on the FOC Due Date, as recorded from the FOC received in response to the last ASR sent. Customer Not Ready (CNR) situations may result in an installation delay. The On Time Performance To FOC Due Date is calculated both with CNR consideration, i.e. measuring the percentage of time the service is installed on the FOC due date while counting CNR coded orders as an appointment met, and without CNR consideration.

Calculation Methodology
Percent On Time Performance to FOC Due Date – With CNR Consideration:

    [(Count of Circuits Completed on or before BellSouth Committed Due Date + Count of Circuits Completed after FOC Due Date with a verifiable CNR code) / (Count of Circuits Completed in Reporting Period)] x 100

Percent On Time Performance to FOC Due Date – Without CNR Consideration:

    [(Count of Circuits Completed on or before BellSouth Committed Due Date) / (Count of Circuits Completed in Reporting Period)] x 100

Note: The denominator for both calculations is the total count of circuits completed during the reporting period, including all circuits, with and without a CNR code.

Business Rules
1. Measures are based on the last ASR sent and the associated FOC Due Date received from BellSouth.
2. Selection is based on circuits completed by BellSouth during the reporting period. An ASR may provision more than one circuit and BellSouth may break the ASR into separate internal orders, however, the ASR is not considered completed for measurement purposes until all circuits are completed.
3. BellSouth Completion Date is the date upon which BellSouth completes installation of the circuit, as noted on a completion advice to TWTC.
4. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided on the FOC Due Date.
5. A Customer Not Ready (CNR) is defined as a verifiable situation beyond the normal control of BellSouth that prevents BellSouth from completing an order, including the following: TWTC is not ready; end user is not ready; connecting company, or CPE (Customer Premises Equipment) supplier, is not ready. BellSouth must ensure that established procedures are followed to notify TWTC of a CNR situation and allow a reasonable period of time for TWTC to correct the situation.

Exclusions
- Unsolicited FOCs
- Disconnect ASRs
- Cancelled ASRs
- Record ASRs

Levels of Disaggregation
- DS0
- DS1
- DS3 & Above

Performance Standard
Percent On Time to FOC Due Date - With CNR Consideration = > 90 % On Time for year 1, & 95% for year 2.

Percent On Time to FOC Due Date - Without CNR Consideration - Diagnostic

PROVISIONING

Measurement: SA-5 Days Late

Description
Days Late captures the magnitude of the delay, both in average and distribution, for those circuits not completed on the FOC Due Date, and the delay was not a result of a verifiable CNR situation. A breakdown of delay days caused by a lack of BellSouth facilities is required for diagnostic purposes.

Calculation Methodology
Average Days Late:

Σ[Circuit Completion Date – BellSouth Committed Due Date (for all Circuits Completed Beyond BellSouth Committed Due Date without a CNR code)] / (Count of Circuits Completed Beyond BellSouth Committed Due Date without a CNR code)

Days Late Distribution:

Circuit Completion Date – BellSouth Committed Due Date (for all Circuits Completed Beyond BellSouth Committed Due Date without a CNR code) distributed by: 1 day, 2-5 Days, 6-10 Days, 11-20 Days, 21- 30 Days, 31-40 Days, and > 40 Days

Average Days Late Due to a Lack of BellSouth Facilities:

Σ[Circuit Completion Date – BellSouth Committed Due Date (for all Circuits Completed Beyond BellSouth Committed Due Date without a CNR code and due to a Lack of BellSouth Facilities] / (Count of Circuits Completed Beyond BellSouth Committed Due Date without a CNR code and due to a Lack of BellSouth Facilities)

Business Rules
1. Measures are based on the last ASR sent and the associated FOC Due Date received from BellSouth.
2. Selection is based on circuits completed by BellSouth during the reporting period. An ASR may provision more than one circuit and BellSouth may break the ASR into separate internal orders, however, the ASR is not considered completed for measurement purposes until all circuits are completed.
3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.
4. A Customer Not Ready (CNR) is defined as a verifiable situation beyond the normal control of BellSouth that prevents BellSouth from completing an order, including the following: TWTC not ready; end user is not ready; connecting company, or CPE (Customer Premises Equipment) supplier, is not ready. BellSouth must ensure that established procedures are followed to notify TWTC of a CNR situation and allow a reasonable period of time for TWTC to correct the situation
5. TWTC required to forecast facility requirements to MSA/CO level on a quarterly basis.

Exclusions
- Unsolicited FOCs
- Disconnect ASRs
- Cancelled ASRs
- Record ASRs
- Projects

Levels of Disaggregation
- DS0
- DS1
- DS3 & Above

Performance Standard

Average Days Late - < 5 Days for year 1, & 3 Days for year 2

Days Late Distribution - Diagnostic

Average Days Late Due to a Lack of BellSouth Facilities - Diagnostic

Measurement: SA-6 Average Intervals - Requested/Offered/Installation

Description
The intent of this measure is to capture three important aspects of the provisioning process and display them in relation to each other. The Average TWTC Requested Interval, the Average BellSouth Offered Interval, and the Average Installation Interval, provide a comprehensive view of provisioning, with the ultimate goal of having these three intervals equivalent.

Calculation Methodology

Average CLEC or IXC Carrier Requested Interval:
    Sum (CRDD – ASR Receive Date) / Total Circuits Completed during reporting period

Average BellSouth Offered Interval:
    Sum (FOC Due Date – ASR Receive Date) / Total Circuits Completed during reporting period

Average Installation Interval:
    Sum (BellSouth Completion Date – ASR Receive Date) / Total Circuits Completed during reporting period

Business Rules
1. Measures are based on the last ASR sent and the associated FOC Due Date received from BellSouth.
2. Selection is based on circuits completed by BellSouth during the reporting period. An ASR may provision more than one circuit and BellSouth may break the ASR into separate internal orders, however, the ASR is not considered completed for measurement purposes until all circuits are completed.
3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.
4. Projects are included. Determination of what is identified as a project varies by ILEC and should not alter the need to ensure that service is provided within expected intervals.
5. The Average Installation Interval includes all completions.

Exclusions
- Unsolicited FOCs
- Disconnect ASRs
- Cancelled ASRs
- Record ASRs
- CNRs (installation interval only)

Levels of Disaggregation
- DS0
- DS1
- DS3 & Above

Performance Standard
Average Requested Interval - Diagnostic
Average Offered Interval - Diagnostic
Average Installation Interval - Diagnostic

Measurement: SA-7 Past Due Circuits

Description
The Past Due Circuits measure provides a snapshot view of circuits not completed as of the end of the reporting period. The count is taken from those circuits that have received an FOC Due Date but the date has passed. Results are separated into those held for BellSouth reasons and those held for CLEC or IXC Carrier reasons (CNRs), with a breakdown, for diagnostic purposes, of Past Due Circuits due to a lack of BellSouth facilities. A diagnostic measure, Percent Cancellations After FOC Due Date, is included to show a percent of all cancellations processed during the reporting period where the cancellation took place after the FOC Due Date had passed

Calculation Methodology
Percent Past Due Circuits:
 [(Count of all circuits not completed at the end of the reporting period > 5 days beyond the FOC Due Date, grouped separately for Total BellSouth Reasons, Lack of BellSouth Facility Reasons, and Total CLEC/Carrier Reasons) / (Total uncompleted circuits past FOC Due Date, for all missed reasons, at the end of the reporting period)] x 100
Past Due Circuits Distribution:
 Count of all circuits past the FOC Due Date that have not been reported as completed (Calculated as last day of reporting period - FOC Due Date) Distributed by: 1-5 days, 6-10 days, 11-20 days, 21-30 days, 31-40 Days, > 40 days
Percent Cancellations After FOC Due Date:
 [Count (All circuits cancelled during reporting period, that were Past Due at the end of the previous reporting period, where (Date Cancelled > FOC Due Date) / (Total circuits Past Due at the end of the previous reporting period)] x 100

Business Rules
1. Calculation of Past Due Circuits is based on the most recent ASR and associated FOC Due Date.
2. An ASR may provision more than one circuit and BellSouth may break the ASR into separate internal orders, however, the ASR is not considered completed for measurement purposes until all segments are completed.
3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.
4. Projects are included. Determination of what is or is not identified as a project varies by ILEC and should not alter the need to ensure that service is provided on the FOC Due Date.
5. A Customer Not Ready (CNR) is defined as a verifiable situation beyond the normal control of BellSouth that prevents BellSouth from completing an order, including the following: TWTC not ready; end user is not ready; connecting company, or CPE (Customer Premises Equipment) supplier, is not ready. BellSouth must ensure that established procedures are followed to notify TWTC of a CNR situation and allow a reasonable period of time for TWTC to correct the situation
6. TWTC required to forecast facility requirements to MSA/CO level on a quarterly basis.

Exclusions
- Unsolicited FOCs
- Disconnect ASRs
- Record ASRs

Levels of Disaggregation
- DSO
- DS1
- DS3 & Above

Performance Standard
Percent Past Due Circuits - Total BellSouth Reasons < 3.0 % > 5 days beyond FOC Due Date

BellSouth Performance Measurements and Standards

Percent Past Due Circuits - Due to Lack of BellSouth Facilities - Diagnostic
Percent Past Due Circuits - Total CLEC Reasons - Diagnostic
Past Due Circuits Distribution - Diagnostic
Percent Cancellation After FOC Due Date - Diagnostic

BellSouth Performance Measurements and Standards

PROVISIONING

Measurement: SA-8 New Installation Trouble Report Rate

Description
New Installation Trouble Report Rate measures the quality of the installation work by capturing the rate of trouble reports on new circuits within 30 calendar days of the installation.

Calculation Methodology

New Installation Trouble Report Rate Within 30 Calendar Days of Installation:
   [Count (circuit failures within 30 Calendar Days of Installation) / (Total Number of Circuits Installed in the Report Period)] x 100

Business Rules
1. The BellSouth Completion Date is the date upon which BellSouth completes installation of the circuit, as noted on a completion advice to TWTC.
2. The calculation for the preceding 30 calendar days is based on the creation date of the trouble ticket.

Exclusions
- Trouble tickets that are canceled at TWTC's request
- CLEC, IXC Carrier, CPE (Customer Premises Equipment), or other customer caused troubles
- BellSouth trouble reports associated with administrative service
- Tickets used to track referrals of misdirected calls
- TWTC requests for informational tickets
- Excludes Repeat trouble reports (Repeat troubles are addressed in SA-11)

Levels of Disaggregation
- DS0
- DS1
- DS3 & Above

Performance Standard
New Installation Trouble Report Rate - DS0/DS1 < = 7% per month new trouble reports for newly installed circuits for year 1, 5.5% per month in year 2, & 4% per month in year 3
                        - DS3/OCn < = 3% per month trouble reports for newly installed circuits in the reporting period for year 1, 2.5% per month for year 2, & 2% per month for year 3.

Measurement: SA-9 Failure Rate

Description
Failure Rate measures the overall quality of the circuits being provided by BellSouth and is calculated by dividing the number of troubles resolved during the reporting period by the total number of "in service" circuits, at the end of the reporting period, and is then annualized by multiplying by 12 months.

Calculation Methodology

Failure Rate – Annualized:
{[(Count of Trouble Reports resolved during the Reporting Period) / (Number of Circuits In Service at the end of the Report Period)] x 100} x 12

Business Rules
1. A trouble report/ticket is any record (whether paper or electronic) used by BellSouth for the purposes of tracking related action and disposition of a service repair or maintenance situation.
2. A trouble is resolved when BellSouth issues notice to TWTC that the circuit has been restored to normal operating parameters.
3. Where more than one trouble is resolved on a specific circuit during the reporting period, each trouble is counted in the Trouble Report Rate.

Exclusions:
- Trouble tickets that are canceled at TWTC's request
- CLEC, IXC Carrier, CPE (Customer Premises Equipment), or other customer caused troubles
- BellSouth trouble reports associated with administrative service
- TWTC requests for informational tickets
- Tickets used to track referrals of misdirected calls

Levels of Disaggregation
- DS0
- DS1
- DS3 & Above

Performance Standard
Failure Rate (Monthly month for year 3.

- Below DS3 < = 3 % per month for year 1, 2.6 % per month for year 2, & 2.4 % per month for year 3.

1.3 % per month for year 3.

- DS3 and Above < = 2.25 % per month for year 1, 1.7 % per month for year 2, &

MAINTENANCE & REPAIR

Measurement: SA-10 Mean Time to Restore

Description
The Mean Time To Restore interval measures the promptness in restoring circuits to normal operating levels when a problem or trouble is referred to BellSouth. Calculation is the elapsed time from TWTC submission of a trouble report to BellSouth to the time BellSouth closes the trouble, less any Customer Hold Time or Delayed Maintenance Time due to valid customer, CLEC, or IXC Carrier caused delays. A breakdown of Mean Time to Restore for those troubles recorded as Found OK / Test OK, is required for diagnostic purposes.

Calculation Methodology
Mean Time To Restore:

Σ [(Date and Time of Trouble Ticket Resolution Closed to TWTC – Date and Time of Trouble Ticket Referred to BellSouth) – (Customer Hold Times)] / (Count of Trouble Tickets Resolved in Reporting Period)]

Mean Time To Restore – Found OK / Test OK:

Σ [(Date and Time of Trouble Ticket Resolution Closed to TWTC as Found OK/Test OK – Date and Time of Trouble Ticket Referred to BellSouth) – (Customer Hold Times)] / (Count of Trouble Tickets Resolved in Reporting Period as Found OK/Test OK)]

Business Rules
1. A trouble report or trouble ticket is any record (whether paper or electronic) used by BellSouth for the purposes of tracking related action and disposition of a service repair or maintenance situation.
2. Elapsed time is measured on a 24-hour, seven-day per-week basis, without consideration of weekends or holidays.
3. Multiple reports in a given period are included, unless the multiple reports for the same customer is categorized as "subsequent" (an additional report on an already open ticket).
4. "Restore" means to return to the normally expected operating parameters for the service regardless of whether or not the service, at the time of trouble ticket creation, was operating in a degraded mode or was completely unusable. A trouble is "resolved" when BellSouth issues notice to TWTC that the customer's service is restored to normal operating parameters.
6. Customer Hold Time or Delayed Maintenance Time resulting from verifiable situations of no access to the end user's premises, or other CLEC or IXC Carrier caused delays, such as holding the ticket open for monitoring, is deducted from the total resolution interval.

Exclusions:
- Trouble tickets that are canceled at TWTC's request
- CLEC, IXC Carrier, CPE (Customer Premises Equipment), or other customer caused troubles
- BellSouth trouble reports associated with administrative service
- TWTC requests for informational tickets
- Trouble tickets created for tracking and/or monitoring circuits
- Tickets used to track referrals of misdirected calls

Levels of Disaggregation
- DS0
- DS1
- DS3 & Above

Performance Standard
Mean Time to Restore   - Below DS3 $< = 4$ Hours per month for year 1, 3.5 Hours per month for year 2, & 3 Hours per month for year 3 (years 2 & 3 to be revisited after year 1).

- DS3 and Above $< = 4$ Hours per month for year 1, 3.5 Hours per month for 2, & 3 Hours per month for year 3 (years 2 & 3 to be revisited after year 1).

Mean Time to Restore – Found OK / Test OK - Diagnostic

MAINTENANCE & REPAIR

Measurement: SA-11 Repeat Trouble Report Rate

Description
The Repeat Trouble Report Rate measures the percent of maintenance troubles resolved during the current reporting period that had at least one prior trouble ticket any time in the preceding 30 calendar days from the creation date of the current trouble report.

Calculation Methodology

Repeat Trouble Report Rate:
> [(Count of Current Trouble Reports with a previous trouble, reported on the same circuit, in the preceding 30 calendar days)] / (Number of Reports in the Report Period) x 100

Business Rules
1. A trouble report or trouble ticket is any record (whether paper or electronic) used by BellSouth for the purposes of tracking related action and disposition of a service repair or maintenance situation.
2. A trouble is resolved when BellSouth issues notice to TWTC that the circuit has been restored to normal operating parameters.
3. If a trouble ticket was closed out previously with the disposition code classifying it as FOK/TOK, then the second trouble must be counted as a repeat trouble report if it is resolved to BellSouth reasons.
4. The trouble resolution need not be identical between the repeated reports for the incident to be counted as a repeated trouble.
5. TOK, FOK, and NTF not to exceed 10% of the total reports in any given rating period for total measured customer reports referenced in performance measures 8, 9, and 11 to be valid in any given month.

Exclusions:
- Trouble tickets that are canceled at TWTC's request
- CLEC, IXC Carrier, CPE (Customer Premises Equipment), or other customer caused troubles
- BellSouth trouble reports associated with administrative service
- Subsequent trouble reports – defined as those cases where a customer called to check on the status of an existing open trouble ticket
- Excludes informational tickets

Levels of Disaggregation
- DS0
- DS1
- DS3 & Above

Performance Standards
Repeat Trouble Report Rate (annualized) - DS0 & DS1 < = 22 % for year 1, 20% for year 2, & 18% for year 3
- DS3 and Above < = 10 % for year 1, 9% for year 2, & 8% for year 3

- Revisit performance standards after year 1.

GLOSSARY

Term	Definition
Access Service Request (ASR)	A request to BellSouth to order new service, or request a change to existing service, which provides access to the local exchange company's network, under terms specified in the local exchange company's special or switched access tariffs
Business Days	Monday thru Friday excluding holidays
Customer Not Ready (CNR)	A verifiable situation beyond the normal control of BellSouth that prevents BellSouth from completing an order, including the following: TWTC not ready; end user is not ready; connecting company, or CPE (Customer Premises Equipment) supplier, is not ready
Facility Check	A pre-provisioning check performed by BellSouth, in response to an access service request, to determine the availability of facilities and assign the installation date
Firm Order Confirmation (FOC)	The notice returned from BellSouth, in response to an Access Service Request from TWTC that confirms receipt of the request, that a facility has been made, and that a service request has been created with an assigned due date
Unsolicited FOC	An Unsolicited FOC is a supplemental FOC issued by BellSouth to change the Due date or for other reasons, although no change to the ASR was requested by TWTC
Project	Service requests that exceed the line size and/or level of complexity that would allow the use of standard ordering and provisioning processes
Query/Reject	A BellSouth response to an ASR requesting clarification or correction to one or more fields on the ASR before an FOC can be issued
Repeat Trouble	Trouble that reoccurs on the same telephone number/circuit ID within 30 calendar days
Supplement ASR	A revised ASR that is sent to change due dates or alter the original ASR request. A "Version" indicator related to the original ASR number tracks each Supplement ASR.